

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	
)	CRIMINAL NO. 04-10060-RCL
GEORGE SCHUSSEL,)	
Defendant)	
)	

JOINT MOTION TO EXCLUDE TIME

The parties jointly move this Court to enter an order specifically excluding the time from September 14, 2004 through the date of the trial of this case, given that this case has been designated a “complex case” pursuant to 18 U.S.C. §3161(h)(8)(B)(ii) and (iv). Furthermore, there are pre-trial motions pending, specifically dealing with various evidentiary issues relating to the attorney client privilege, opinion and work product privilege, joint privilege, corporate privilege, statute of limitations, and other legal issues, which necessitate the exclusion of time, pursuant to 18 U.S.C. §3161(h)(1)(F). Furthermore, the ends of justice served by allowing time for the parties to prepare the litigation of this complex and lengthy trial, outweigh the defendant’s and the public’s interest in a speedy trial. See 18 U.S.C. § 3161(h)(8)(A).

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

GEORGE SCHUSSEL
Counsel for Defendant

By: /s/ Carmen M. Ortiz
Carmen M. Ortiz
Assistant U.S. Attorney

/s/ Martin G. Weinberg
Martin G. Weinberg, Esq.

Date: November 16, 2005

/s/ Frank J. DiMento, Sr.
Frank J. DiMento, Sr., Esq.

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

GEORGE SCHUSSEL,
Defendant

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CRIMINAL NO. 04-10060-RCL

ORDER EXCLUDING TIME

The Court orders that the period of time from September 14, 2004, through _____, the date of the trial of this case, is excludable under 18 U.S.C. §3161(h)(8)(B)(ii) and (iv); and 18 U.S.C. § 3161(h)(8)(A), because this is a “complex case” and the ends of justice served by allowing time the parties to prepare the litigation of this complex and lengthy trial, outweigh the defendant’s and the public’s interest in a speedy trial.

Hon. Reginald C. Lindsay
United States District Judge

Dated: _____